

Michael C. Mills, Esq.
Nevada Bar No. 003534
Bauman Loewe Witt & Maxwell, PLLC
3650 North Rancho Drive, Suite 114
Las Vegas, Nevada 89130
Telephone: (702) 240-6060
mmills@blwmlawfirm.com

Attorneys for Defendant
THE PRUDENTIAL INSURANCE COMPANY OF
AMERICA

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LORI HARRELSON,

Plaintiff,

v.

PRUDENTIAL INSURANCE COMPANY OF
AMERICA,

Defendant.

Case No. 2:23-cv-00648-JCM-BNW

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO ANSWER
COMPLAINT**

(FIRST REQUEST)

Plaintiff Lori Harrelson ("Plaintiff") and Defendant The Prudential Insurance Company of America ("Prudential" or "Defendant") (collectively, the "Parties"), hereby stipulate that Prudential shall have a twenty-one (21) day extension of time to answer or otherwise respond to Plaintiff's Complaint. In support of their stipulation, the Parties state as follows:

1. Plaintiff filed her Complaint on April 25, 2023. (ECF No. 1.)
2. Prudential was served via the Nevada Division of Insurance on May 12, 2023 (ECF No. 4), and Prudential's Answer is currently due on June 12, 2023 (including the extension granted by NRS 680A.260(3)).
3. Prudential is promptly collecting and reviewing the relevant file documents in order to prepare a response to Plaintiff's Complaint, but requests twenty-one (21) additional days, until and including July 3, 2023, to complete its investigation and prepare its response.

1 4. On June 8, 2023, Counsel for Defendant conferred with Counsel for Plaintiff, who
2 indicated that Plaintiff does not object to or oppose Defendant's request for an extension.

3 5. This is Defendant's first request for an extension.

4 6. This stipulation is filed before the response to the Complaint is due and is filed in good
5 faith and not for the purpose of unwarranted delay.

6 WHEREFORE, the Parties request that the Court extend the deadline for Prudential to answer or
7 otherwise respond to Plaintiff's Complaint by twenty-one (21) days until and including July 3, 2023.

8 DATED: June 9, 2023

Respectfully submitted,

9 LAW OFFICE OF JULIE A. MERSCH

BAUMAN LOEWE WITT & MAXWELL, PLLC

10
11 By: s/ Julie A. Mersch

By: s/ Michael C. Mills

12 Julie A. Mersch, Esq.
13 LAW OFFICE OF JULIE A. MERSCH
14 1100 E. Bridger Ave.
15 Las Vegas, Nevada 89101
Email: jam@merschlaw.com
Attorney for Plaintiff
LORI HARRELSON

Michael C. Mills
One of the attorneys for Defendant
THE PRUDENTIAL INSURANCE
COMPANY OF AMERICA

16
17
18 IT IS SO ORDERED:

19
20 

21 U.S. Magistrate Judge

22 DATED: June 12, 2023

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he electronically filed and served the foregoing document with the Clerk of the United States District Court for the District of Nevada using the CM/ECF system on this 9th day of June, 2023, which sent notification of such filing to all counsel of record, including the following:

Julie A. Mersch, Esq.
LAW OFFICE OF JULIE A. MERSCH
1100 E. Bridger Ave.
Las Vegas, Nevada 89101
Email: jam@merschlaw.com

/s/ Michael C. Mills
Michael C. Mills